# **TITLE V PERMIT STATEMENT**

Facility Name: Tennessee Gas Pipeline Company L.L.C. (TGP) – Station 555

City: Cypress Inn

County: Wayne

**Date Application Received:** March 07, 2017

Date Application Deemed Complete: March 07, 2017

**Emission Source Reference No.:** 91-0001

**Permit No.:** 572602

INTRODUCTION

This narrative is being provided to assist the reader in understanding the content of the attached Title V operating permit. This Title V Permit Statement is written pursuant to Tennessee Air Pollution Control Rule 1200-03-09-.02(11)(f)1.(v). The primary purpose of the Title V operating permit is to consolidate and identify existing state and federal air requirements applicable to *Tennessee Gas Pipeline Company L.L.C. (TGP) – Station 555* and to provide practical methods for assuring compliance with these requirements. The following narrative is designed to accompany the Title V Operating Permit. It initially describes the facility receiving the permit, then the applicable requirements and their significance, and finally the compliance status with those applicable requirements. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public participation process will be described in an addendum to

Acronyms

this narrative.

PSD - Prevention of Significant Deterioration

NESHAP - National Emission Standards for Hazardous Air Pollutants

NSPS - New Source Performance Standards

MACT - Maximum Achievable Control Technology

NSR - New Source Review

GHGs - Greenhouse Gases

I. Identification Information

A. Source Description

Tennessee Gas Pipeline Company L.L.C. (TGP) is an interstate natural gas pipeline. TGP owns and operates Station 555 in Cypress Inn, TN, in Wayne County. This is a compressor station for transporting natural gas through the transmission pipeline system. The station has:

- 01 Six (6) natural gas-fired 2SLB reciprocating engines, one (1) natural gas-fired compressor turbine engine
- 02 One (1) natural gas-fired 4SLB emergency generator engine, one (1) natural gas-fired 4SRB emergency generator engine
- 03 Three (3) natural gas-fired water heaters, one (1) natural gas-fired fuel heater and one (1) natural gas-fired waste water evaporator.

## B. Facility Classification

- Attainment or Non-Attainment Area Location
  Area is designated as an attainment area for all criteria pollutants.
- 2. Company is located in a Class II area. (this means that the facility is not located within a national park or national wilderness area; see 40 CFR 52.21(e) for complete definition).

## C. Regulatory Status

#### 1. PSD/NSR

This facility is a major source above the PSD threshold of 250 tpy based on PTE for  $NO_x$  and CO at 4,287.32 and 586.57 tons/yr, respectively.

2. Title V Major Source Status by Pollutant

	Is the pollutant emitted?	If emitted, what is the facility's status?		
Pollutant		Major Source Status	Non-Major Source	
			Status	
PM	Yes	No		
$PM_{10}$	Yes	N/A		
$SO_2$	Yes	No		
VOC	Yes	No		
$NO_X$	Yes	Yes		
CO	Yes	Yes		
Individual HAP	Yes	Yes		
Total HAPs	Yes	Yes		
CO <sub>2</sub> (e)	Yes	Yes		

#### 3. MACT Standards

This facility is a major source for HAPS.

**40 CFR 63 Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE)** Pursuant to §63.6590(b)(3)(i) the Permittee's six (6) existing spark ignition (SI) 2 stroke lean burn (2SLB) stationary RICE with a site rating of more than 500 brake HP each are not subject to any of the requirements of this subpart and of subpart A of this part, including initial notification requirements for these engines; however, the Permittee's two (2) existing (built prior to June 12, 2006) emergency stationary SI RICE with a site rating of less than or equal to 500 brake HP each have applicable requirements under this subpart.

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40 CFR 63 Subpart DDDDD—National Emissions Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters Pursuant to §63.7495 the Permittee's existing three (3) natural gas-fired water heaters, and one (1) natural gas-fired evaporator, and one (1) new natural gas-fired fuel heater are subject to the requirements of this subpart.

## 4. Program Applicability

Are the following programs applicable to the facility?

PSD (Yes)

NESHAP (Yes)

NSPS (No)

## **II.** Compliance Information

## A. Compliance Status

Is the facility currently in compliance with all applicable requirements? Yes

Are there any applicable requirements that will become effective during the permit term? No

## **III. Other Requirements**

## A. Emissions Trading

The facility is not involved in an emission trading program.

## B. Acid Rain Requirements

This facility is not subject to any requirements in Title IV of the Clean Air Act.

## C. Prevention of Accidental Releases

Not applicable

## D. Greenhouse Gas (GHG) Emissions

This facility is a major source of greenhouse gas emissions with a potential-to-emit of approximately 130,139.79 tons per year of carbon dioxide equivalent tonnage.

## **IV. Public Participation Procedures**

Notification of this draft permit was mailed to the following environmental agencies:

- 1. EPA Region IV
- 2. Alabama Dept. of Environmental Management
- 3. Mississippi Dept. of Environmental Quality

## V. Permit History

Title V Operating Permit No. 572602 represents the third renewal of the original Title V Permit No. 546590 issued February 9, 1998. The first renewal permit no. 555659 was issued June 25, 2004. The second renewal permit no. 562544 was issued September 5, 2012

• Title V Renewal Application dated March 1, 2017 by Tennessee Gas Pipeline Company, LLC (TGP) was received by the Division on March 7, 2017. No changes have been requested.

VIII.	<b>Public Participation Important Dates:</b>	
	EPA concurrent review requested	Yes
	Public Notice publication date	
	Public Notice period completion date	
	Public Notice publication comments	
	EPA Notification date	

EPA review period completion date

EPA review comments

# IX. Current Total Annual Emissions (Potential/Allowable) (ton/yr)

Pollutant	PM	SO2	СО	voc	NOx	HAPs*	CO <sub>2</sub> (e) GHG
Source (91-0001)							
01	32.71	0.63	586.57	74.75	4,287.32	49.38	125,246
02	0.02	0.001					2,790
03	0.12	Neg	1.34	Neg	1.59	Neg	1,880
Plant-wide							
Total	32.85	0.631	587.91	74.75	4,288.91	49.38	129,916